**EU and its Member States comments on the template for the Advanced Comments on Draft Documents on Planning, Reporting and Review Mechanisms for the Resumed Session of the Third Meeting of the Subsidiary Body on Implementation**

**Version 28.02.2022**

**TEMPLATE FOR COMMENTS: Draft guidance for updating national biodiversity strategies and action plans in light of the post-2020 global biodiversity framework contained in CBD/SBI/3/11/ADD 4**

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| **Advanced comments on the draft documents on Planning, Reporting and Review Mechanisms for the Resumed Session of the Third Meeting of the Subsidiary Body on Implementation** |
| **Scope of this template for comments**  | Guidance for updating national biodiversity strategies and action plans in light of the post-2020 global biodiversity framework, contained in the document CBD/SBI/3/11/Add.4 which includes a draft version of Annex A to CBD/SBI/3/CRP.5.  |
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| **Comments** |
| Please provide any general comments on the national biodiversity strategy and action plan guidance. EU and its Member States agree with the general content of this annex, there is, however, an extensive need for further development. We provide following general comments:* It is essential that this annex is adopted already at COP 15.
* The language of the annex is in many places not aligned with terms and general language used in the document CBD/SBI/3/CRP5, such as describing types of indicators as national and headline instead of headline, component and complementary indicators or using term commitments from actors beyond national governments instead of non-state actors’ commitments. Although we understand that not all the language is finalized in the CRP5, the language in the final version of the annex must be fully aligned with relevant COP decisions related to resource mobilization/ capacity building and development, monitoring framework and more.
* We also note that the document is heavily focused on the concept of national targets and it does not provide much guidance on the general preparation of the NBSAPs. We understand that this annex complements previous guidance on the development of NBSAPs, but we still believe that it would be appropriate to provide further detail in relevant areas.
* We support the common elements that would be the same for all Parties and would enable aggregation of national ambitions. These should be concise and we wish to avoid undue or disproportionate burden in their preparation.
* We strongly support the idea of national targets that would be directly aligned with post 2020 targets and that would be submitted by Parties to the Secretariat within one year after the adoption of the GBF as they are described in paragraphs 7 and 8. We believe that national targets should be reported to the Secretariat according to article 26 of the Convention to ensure that all Parties will report them. The template for reporting on national targets may not be a part of the NBSAP guidance but instead a separate Annex I is required. The reason for this is that a reporting template forms part of the Parties’ reporting obligation under the Convention and is not merely guiding.
* Meeting the 2030 Action Targets is matter of ambition, and a matter of implementation (action). Parties should be encouraged to “adapt or enhance” the NBSAPs to reflect the GBF outcomes at the national level and pursuant to the outcomes of the global stocktake. In general, we feel the Guidance contained in the Annex is not suitable for either ensuring that future NBSAPs are streamlined and comparable, or for identifying national actions relevant to the delivery of the 2030 Action Targets, further extensive work needs to be done.
* We believe there is an internal discrepancy between paragraphs 5 and 7, where the paragraph 5 only recommends that the review of NBSAPs should be completed within one year after the adoption of the post-2020 GBF, while paragraph 7 requests that national targets are already submitted within this time. We believe that these processes are inherently interconnected and this process should be better described and aligned.
* We support the introduction of “Monitoring and review mechanism using national and headline indicators”, we note however, that it is not clear from the text of the annex how this should be operationalized in the NBSAPs. We also note that the correct term used for indicators is headline, component and complementary.
* Paragraph 6(c) should be more precise and specify that the NBSAP should identify the indicators to be used, the relevant agencies responsible for collecting the data and compiling those indicators, any need for further development of such indicators and any capacity building needs.
* In paragraph 8 capacity building and development plans should also be mentioned, see CRP SBI3 13 so the text should read *“.....development of national finance plans as well as capacity building and development plans so that ......”*
* Several targets contain several elements and for several of those elements there may be multiple ways of formulating national targets. Consistency is crucial for preparing the Global Gap Reports. Therefore, we suggest introducing specific question/possible subsection with regards to individual global targets such as spatial planning, IUU fishing, wildlife trafficking, sustainable forest management, agriculture. For instance, for T2 we could specify restoration targets per biome, and specifying the area where restoration implies a change from managed ecosystems back into natural ecosystems. These suggestions will need to be adjusted in accordance with the final wording of the targets.
* The guidance for NBSAPs, national reports, and the monitoring framework are complementary tools, which together present a joined up package for parties to enhance implementation. They should ideally be adopted at COP15 but are linked with other negotiations such as SBSTTA24 AI3 (monitoring framework).
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| Please use the table below to provide any specific comments on the template:  |

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| **Section** | **Comment** |
| 1 | Please provide comments on section 1 which includes the elaboration of national targets towards each of the global targets of the post-2020 global biodiversity framework.* We agree that Parties should adopt national targets to each of the global targets. This section should be mandatory for each of the global targets, with possible specific subsections for relevant targets, reflecting their components/elements (as mentioned above).
* We believe that it might be more appropriate that Global Target 1 is replaced by National target 1 as it might be that several national targets contribute to the same global target. A new drop-down field should be added with all the global targets so one can chose to which global target it relates.
* Indicators (Headline, if applicable component and complementary as well as national) that will be used for monitoring should be mandatory part of the national targets and they should be added as separate fields into this section.
* The intended actions associated with the national target that will be included or annexed in the updated/revised NBSAP should also be listed in this section, alongside a planned timeline of their implementation and associated funding sources.
* We would like to introduce the text that would ask to “*Please summarize the main policy measures or actions that will be taken in order to achieve this (optional)”*.
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| 2 | Please provide comments on section 2 on who is responsible for coordinating implementation and reporting on this target.* We are not certain that this section has necessary added value to be included in the final version of the annex. It is useful when developing the national targets and updating the NBSAP but for the global reporting on national targets this doesn’t have any additional value and can’t be used for any evaluation.
* Alternatively, we would make this section optional.
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| 3 | Please provide comments on section 3 on the linkages with other national initiatives and targets.* We propose to name this section “*History of the target”* to clarify that it only serves to clarify, whether the national target is part of the existing national commitments or if it is a new national target.
* A drop-down list should be introduced for ease of use and evaluation.
* For some Parties this process might be very complex and therefore this has to be either made simple by using tools such as DaRT or this section should be optional.
* If the answer is “no”, there should be a possibility to provide further information such as a summary of the implementation challenges faced and proposals to overcome them.
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| 4 | Please provide comments on section 4 on involvement of sub-national or other actors beyond national governments. * This section should be optional.
* This section should invite explicitly also to indicate any overlap between national targets and any non-state actor commitments.
* The heading of the section potentially needs rephrasing as now it seems like the other commitments are more important than the national target. Alternative wording could be: Are there any overlaps with commitments submitted separately by subnational governments, or other actors beyond national governments that are linked to this national target?
* If subnational governments, or other actors beyond national governments have already submitted commitments then it should be possible to link to these commitments and not mentioning again the names of the actors and the context. It should be a searchable field linked to the commitments submitted by subnational governments, or other actors beyond national governments.
* If the answer is “no”, there should be a possibility to provide further information.
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